## Message

From: Sack, Chris A [Chris.Sack@fda.hhs.gov]

**Sent**: 3/3/2016 2:24:04 PM

To: Hrdy, David [Hrdy.David@epa.gov]
Subject: RE: Glyphosate tolerance questions

Thanks David!

Chris

Ph: 240-402-2464

From: Hrdy, David [mailto:Hrdy.David@epa.gov]

**Sent:** Thursday, March 03, 2016 7:43 AM

To: Sack, Chris A

Cc: mike.papathakis@cdpr.ca.gov; Miller, David; Crowley, Matthew; Vogel, Dana; Smith, Charles; Bloem, Thomas

**Subject:** FW: Glyphosate tolerance questions

Hi Chris,

AMPA is no longer a part of the Glyphosate tolerance expression. Since you are not measuring the N-acetyl glyphosate all of your compliance decisions will be based upon only the glyphosate level. That is correct. Your question - why do both tolerance expressions include the statement glyphosate, including its metabolites and degradates? I understand how that can be confusing but even though you are analyzing AMPA separately and apart from glyphosate, you are correct in how you read the expressions, AMPA levels are not to be included in the compliance evaluation. That is correct, only glyphosate.

I will call you soon to check in on this and a few other items.

David

David E. Hrdy
Senior Scientist
CEB/HED/OPP/OCSPP

US EPA <u>www.epa.gov/pesticides</u>

Mailcode 7509P

Telephone: 703.305.6990

Fax: 703.305.5147

OFFICE 10248 Potomac Yard 1 (South)

From: Bloem, Thomas

**Sent:** Thursday, March 03, 2016 7:07 AM **To:** Hrdy, David < <u>Hrdy.David@epa.gov</u>> **Subject:** RE: Glyphosate tolerance questions

That is correct AMPA is not in the tolerance expression.

AMPA used to be in the tolerance expression but was eliminated in the early 90s based on tox considerations.

From: Hrdy, David

**Sent:** Wednesday, March 02, 2016 4:27 PM **To:** Bloem, Thomas < <u>Bloem.Thomas@epa.gov</u>> **Subject:** FW: Glyphosate tolerance questions

Tom,

Just confirming - no AMPA, right?

David

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David E. Hrdy
Senior Scientist
CEB/HED/OPP/OCSPP

US EPA www.epa.gov/pesticides

Mailcode 7509P

Telephone: **703.305.6990** 

Fax: 703.305.5147

OFFICE 10248 Potomac Yard 1 (South)

From: Sack, Chris A [mailto:Chris.Sack@fda.hhs.gov]

Sent: Wednesday, March 02, 2016 3:15 PM
To: Hrdy, David < Hrdy.David@epa.gov >
Cc: mike.papathakis@cdpr.ca.gov

Subject: Glyphosate tolerance questions

Hi David,

I got a tolerance question from Mike Papathakis at California Dept of Pesticide Regulation (CDPR). According to 40 CFR 180.364 for glyphosate has two sets of tolerances:

- (1) Tolerances are established for residues of glyphosate, including its metabolites and degradates, in or on the commodities listed below resulting from the application of glyphosate, the isopropylamine salt of glyphosate, the ethanolamine salt of glyphosate, the dimethylamine salt of glyphosate, the ammonium salt of glyphosate, and the potassium salt of glyphosate. Compliance with the following tolerance levels is to be determined by measuring only glyphosate (*N*-(phosphonomethyl)glycine).
- (2) Tolerances are established for residues of glyphosate, including its metabolites and degradates, in or on the commodities listed below resulting from the application of glyphosate, the isopropylamine salt of glyphosate, the ethanolamine salt of glyphosate, the dimethylamine salt of glyphosate, the ammonium salt of glyphosate, and the potassium salt of glyphosate. Compliance with the following tolerance levels is to be determined by measuring only glyphosate (*N*-(phosphonomethyl)glycine) and its metabolite *N*-acetyl-glyphosate (*N*-acetyl-*N*-(phosphonomethyl)glycine; calculated as the stoichiometric equivalent of glyphosate).

## **Deliberative Process / Ex. 5**

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Thanks,

Chris Sack
Residue Expert
Office of Food Safety
Center for Food Safety and Applied Nutrition
US Food and Drug Administration

Phone: 240-402-2464